

THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE  
CARLOS JAVIER SOTO GONZALEZ  
XXX-XX-2572  
DEBTOR(S)

CASE NO.: 19-04523 BKT

CHAPTER 13

**MOTION REQUESTING THE IMPOSITION OF THE AUTOMATIC STAY**

TO THE HONORABLE COURT:

Now comes debtor through undersigned Attorney and respectfully ALLEGES, STATES and PRAYS:

1. Debtor filed a fourth Chapter 13 bankruptcy petition on August 9, 2019, case number 19-04523 BKT.
2. Debtor has filed this petition to protect his offspring home since is the only residence for his children.
3. Debtor is in a more stable position to comply with the terms of the plan and the domestic support obligation arrears have decrease.

WHEREFORE, is respectfully prayed from this Honorable Court to Order the Continuation of the Automatic Stay or the imposition of the Automatic Stay over debtor and his property.

**CERTIFICATE OF SERVICE:** I hereby certify that on this date, I electronically filed the above document with the Clerk of the Court using an ECF/CM System which sends notification of such filing to ECF/CM user and by regular mail to the non ECF/CM users.

Within FOURTEEN (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise

In Bayamón, Puerto Rico, this August 15, 2019.

/s/ Michelle Rivera Colón  
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Label Matrix for local noticing  
0104-3  
Case 19-04523-BKT13  
District of Puerto Rico  
Old San Juan  
Thu Aug 15 11:52:26 AST 2019

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